

EXHIBIT “A”

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER**

Index No.: 65702/2021

10/27/2021

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LATIA WILLIAMS,

Plaintiff,

Plaintiff designates
Westchester County
as the place of trial

The basis of the venue is:
Plaintiff's Residence, and/or
Place of Accident

-against-

SUMMONS

Plaintiff resides at:
1105 South 11th Avenue
Mt. Vernon, New York

TARGET CORPORATION,

Defendant.
-----X

To the above named Defendant

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Bronx, New York
September 21, 2021

Mark B. Rubin

Attorney for Plaintiffs
MARK B. RUBIN, P.C.
Post Office Address
3413 White Plains Road
Bronx, New York 10467
(718) 231-1515

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

-----X
LATIA WILLIAMS,

Plaintiff,

-against-

VERIFIED COMPLAINT
Index No.: 65702/2021

TARGET CORPORATION,

Defendant.
-----X

Plaintiff, by Mark B. Rubin, P.C., her attorney, complaining of the defendant, respectfully
alleges:

FIRST: That upon information and relief at all times hereinafter mentioned, the
defendant, was a foreign corporation doing business in the State of New York.

SECOND: That upon information and relief at all times hereinafter mentioned, the
defendant, was a domestic corporation.

THIRD: That upon information and belief at all times hereinafter mentioned the
defendant owned a store located at 500 East Sandford Boulevard, Mount Vernon, New York.

FOURTH: That upon information and belief at all times hereinafter mentioned the
defendant, its agents, servants, and/or employees operated said store located at 500 East Sandford
Boulevard, Mount Vernon, New York.

FIFTH: That upon information and belief at all times hereinafter mentioned, the
defendant, its agents, servants, and/or employees managed said store located at 500 East Sandford
Boulevard, Mount Vernon, New York.

SIXTH: That upon information and belief, at all times hereinafter mentioned, the

exercise of reasonable inspection, observation and care; in negligently and dangerously pushing shopping carts in the store; in negligently and dangerously pushing shopping carts through a double door without due regard for the safety of store customers and more particularly this plaintiff; in having inadequate, incompetent, and/or insufficient help, and in violating the applicable, statutes, rules, ordinances and regulations in such cases made and provided, and the defendants were otherwise negligent.

TENTH: That by reason of the foregoing this plaintiff was caused to suffer and sustain severe and serious injuries in and about her head, face, body and limbs, some of which are believed to be permanent, thereby rendering her sick, sore, lame and disabled, causing her to suffer and she still suffers, and upon information and belief, she will in the future suffer great physical pain, mental anguish and suffering; causing her to be confined to her bed and/or home for a great length of time; causing her to be unable to pursue and she is still unable to fully pursue her usual vocation and activities; and upon information and belief, she will in the future be unable to fully perform her usual vocation and activities; causing her to expend and have expended on her behalf, and she will, upon information and belief, in the future, be caused to expend and have expended on her behalf divers sums of money for medical aid and assistance in an effort to cure herself of her injuries, and she was otherwise damaged in an amount in excess of the upper monetary jurisdictional limit of all lower courts.

ELEVENTH: Plaintiff's recovery shall not be limited by Article 16 of the CPLR or any other provision of law and is specifically excluded from such limitations by the exemptions provided for in CPLR Section 1602(2)(iv) and (7).

WHEREFORE, plaintiff demands judgment against the defendant in an amount in excess

of the upper monetary jurisdictional limit of all lower courts, all together with the costs, interest and disbursements of this action.

Mark B. Rubin

MARK B. RUBIN, P.C.
Attorney for Plaintiff
Office & P.O. Address
3413 White Plains Road
Bronx, New York 10467
(718) 231-1515

STATE OF NEW YORK, COUNTY OF BRONX

ss:

Latia Williams

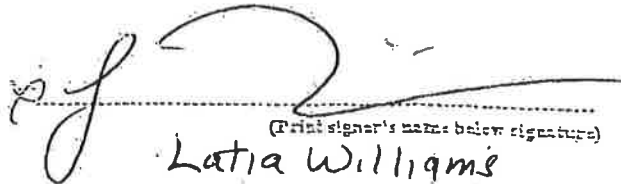
being sworn says: I am plaintiff

[X]

in the action herein; I have read the annexed Complaint

Individual
Verification

know the contents thereof and the same are true to my knowledge,
except those matters therein which are stated to be alleged on information
and belief, and as to those matters I believe them to be true.


(Print signer's name below signature)
Latia Williams

Sworn to before me on September 21, 2021
Mark B. Rubin

MARK B. RUBIN
Notary Public - State of New York
No. 02RU4838597
Qualified in Westchester County
My Commission Expires Jan. 31, 2022

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WESTCHESTER

LATIA WILLIAMS,

Plaintiff,

- against -

TARGET CORPORATION,

Defendants

SUMMONS AND VERIFIED COMPLAINT

MARK B. RUBIN, P.C.

Attorney for Plaintiff
3413 White Plains Road
Bronx, New York 10467
(718) 231-1515

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: September 21, 2021

Signature Mark B. Rubin

Print Signer's Name. Mark .B. Rubin

Service of a Copy of the within

is hereby admitted.

Dated:

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Attorney(s) for